UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA

LIGTEL COMMUNICATIONS, INC.,

                    Plaintiff,

        v.

BAICELLS TECHNOLOGIES INC.;
BAICELLS TECHNOLOGIES NORTH AMERICA
INC.,

                  Defendants.

Case No. 1:20-cv-00037-HAB-SLC

DECLARATION OF GABRIEL K. GILLETT IN SUPPORT OF
PLAINTIFF'S PRE-HEARING MEMORANDUM OF LAW IN SUPPORT OF
PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

GABRIEL K. GILLETT, of full age, hereby declares as follows:

1.   I am an attorney-at-law of the State of Illinois and a partner in the firm of Jenner & Block, LLP. Our firm is counsel of record for Plaintiff LigTel Communications, Inc., ("LigTel") in the above-captioned matter.

2.   I submit this declaration in support of LigTel's Motion for a Preliminary Injunction.

3.   Attached hereto as Exhibit 1 is a true and correct copy of a September 4, 2017 email from Jesse Raasch to Lixin Sun re: Resume (BAICELLS-000013479_EN).

4.   Attached hereto as Exhibit 2 is a true and correct copy of a screenshot of a Facebook post from Matt Hoppes, dated September 1, 2016 (BAICELLS-00008469).

5.   Attached hereto as Exhibit 3 is a true and correct copy of a June 26, 2019 email from Josh Wentworth to Jeff Brown re: Sandhills Wireless in Huawei Unit (LT001519).

6.   Attached hereto as Exhibit 4 is a true and correct copy of Baicells's PLMN Migration PowerPoint Presentation submitted to ATIS (BAICELLS-000000001).

7.   Attached hereto as Exhibit 5 is a true and correct copy of a March 3, 2020 email from Rick Harnish to Jon Truell email re: We Have Our Own HNI (BAICELLS-000062557).

8.   Attached hereto as Exhibit 6 is a true and correct copy of a September 12, 2019 email from Bo Wei to Tom Goode, et al, re: Baicells' Plan on PLMN Migration (BAICELLS-000007936).

9.   Attached hereto as Exhibit 7 is a true and correct copy of Baicells's PLMN Migration Updated PowerPoint Presentation (BAICELLS-000008415).

10.   Attached hereto as Exhibit 8 is a true and correct copy Baicells's August 7, 2019 PLMN Migration Plan for Cloud EPC in NA (BAICELLS-000008105).

11.   Attached hereto as Exhibit 9 is a true and correct copy of a July 9, 2019 email from Ronald Mao to Andy Yang re: PLMN Conflict with NA CloudCore (BAICELLS-000007866).

12.   Attached hereto as Exhibit 10 is a true and correct copy of a July 22, 2019 email from Jesse Raasch to Chad Murrish, et al., re: Baicells-Application for HNI (BAICELLS-000008178).

13.   Attached hereto as Exhibit 11 is a true and correct copy of a November 6, 2019 PowerPoint titled "Discussion of Baicells Migration Plan: IOC Virtual Meeting" (BAICELLS-000008430).

14.   Attached hereto as Exhibit 12 is a true and correct copy of Baicells's PLMN Migration Updated PowerPoint Presentation (BAICELLS-000008415).

15.   Attached hereto as Exhibit 13 is a true and correct copy of a September 6, 2016 email from Jesse Raasch to Rick Harnish, et al., re: Technical Issue (BAICELLS-000034211).

16.   Attached hereto as Exhibit 14 is a true and correct copy of Baicells's PLMN Migration PowerPoint Presentation (BAICELLS-000007844).

17.   Attached hereto as Exhibit 15 is a true and correct copy of the PLMN-ID Survey Report: Full List of PLMN ID in United States (BAICELLS-000062625).

18.   Attached hereto as Exhibit 16 is a true and correct copy of a July 9, 2019 email from Andy Yang to Jesse Raasch re: [Baicells Technologies] "US Support Team (Level 1)" Assignment LigTel MCC/MNC Issue (BAICELLS-000004741).

19.   Attached hereto as Exhibit 17 is a true and correct copy of a July 8, 2019 email from Sam Tetherow to Randy Mead re LigTel HNI Code (LT001384).

20.   Attached hereto as Exhibit 18 is a true and correct copy of Baicells's Responses to LigTel's First Set of Interrogatories, dated March 24, 2020.

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21.   Attached hereto as Exhibit 19 is a true and correct copy of an August 21, 2019 email

from Bo Wei to Natalie McNamer (ATIS) re: Use of HNI 310-90(0) (BAICELLS-000008078-79).

22.   Attached hereto as Exhibit 20 is a true and correct copy of printouts from Baicells's

public website on January 12, 2020.

I declare under penalty of perjury that the foregoing is true and correct.

                          /s/ Gabriel K. Gillett
                          Gabriel K. Gillett

Dated: April 3, 2020